

EXHIBIT E

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIMOTHY KING, MARIAN ELLEN
SHERIDAN, JOHN EARL HAGGARD,
CHARLES JAMES RITCHARD, JAMES
DAVID HOOPER, and DARREN WADE
RUBINGH,

Plaintiffs,

v

GRETCHEN WHITMER, in her official
capacity as Governor of the State of
Michigan, JOCELYN BENSON, in her
official capacity as Michigan Secretary of
State and the Michigan BOARD OF STATE
CANVASSERS,

Defendants,

CITY OF DETROIT,

Intervening Defendant,

ROBERT DAVIS,

Intervening Defendant,

DEMOCRATIC NATIONAL
COMMITTEE and MICHIGAN
DEMOCRATIC PARTY,

Intervening Defendant.

No. 2-20-cv-13134

HON. LINDA V. PARKER

MAG. R. STEVEN WHALEN

**DECLARATION OF ERIK A.
GRILL IN SUPPORT OF
DEFENDANTS WHITMER
AND BENSON'S MOTION
FOR SANCTIONS UNDER
28 U.S.C. § 1927**

**DECLARATION OF ERIK A. GRILL IN SUPPORT OF DEFENDANTS
WHITMER AND BENSON'S MOTION FOR SANCTIONS UNDER
28 U.S.C. § 1927**

I, Assistant Attorney General Erik A. Grill, being duly sworn, voluntarily state as follows:

1. I have been licensed to practice law in the State of Michigan since 2002.
2. I primarily practice law in Ingham County, Michigan.
3. I have worked for the State of Michigan since December 2002.
4. During my more than 18 years of practice, I have worked in the Attorney General's State Operations Division, the Public Employment, Elections and Tort Division, and the Civil Litigation, Employment and Elections Division. I have also worked for the General Counsel of the Department of Insurance and Financial Services.
5. I am presently a Senior Attorney in the Civil Litigation, Elections & Employment Division. In this position, I have unique experience and substantial expertise in the field of election law, and I have frequently handled election cases in state and federal courts at both the trial court and appellate court levels.
6. Collaborating with my Division Chief, Heather Meingast, I researched and drafted the various submissions filed by Defendants Whitmer, Benson, and the Board of State Canvassers in this matter, with each of us handling different issues and working on separate parts of the submissions.
7. To the best of my recollection, the following chart accurately reflects the time I personally spent on various activities performed in defense of this matter:

Date	Activity	Hours
11/27/20	Review Plaintiffs' Complaint	1.0
11/29/20	Review Plaintiffs' Amended Complaint and exhibits	1.0
11/30/20	Review Plaintiffs' emergency motion for declaratory judgment and injunctive relief	1.0
12/2/20	Legal research on laches, standing, Eleventh Amendment, Electors & Elections Clauses, Equal Protection, and Due Process.	2.0
12/2/20	Draft portions of Defendants' response to Plaintiffs' emergency motion for declaratory and injunctive relief	5.0
12/2/20	Review and edit Brater Declaration in support of Defendants' Response to Plaintiffs' emergency motion for declaratory and injunctive relief	0.5
12/2/20	Review and edit draft of Defendants' Response to Plaintiffs' emergency motion for declaratory and injunctive relief before filing	0.5
12/2/20	Draft response to emergency motion to seal	0.5
12/7/20	Review December 7, 2020, Opinion & Order	0.5
12/22/20	Draft portions of Defendants' motion to dismiss and review; Review and edit draft before filing	2
1/14/20	Review City of Detroit's Motion for Sanctions and draft Defendants' concurrence with that motion	1.0
1/19/20	Review voluntary dismissal; Legal research on federal rules for voluntary dismissal	0.25

Total Hours	15.25
Reasonable rate ¹	\$375/hr
 Total Attorney Fees/Costs	 \$5,718.75

I declare under penalty of perjury that the foregoing is true and correct.

Erik A. Grill

Dated: January 28, 2021

¹ Based on the State Bar of Michigan's 2020 Economics of Law Practice in Michigan Survey, the median and mean billing rates for election law attorneys in the Lansing area is \$300 and \$395 respectively. See <https://www.michbar.org/file/pmrc/articles/0000156.pdf>. Given my years of experience, an hourly rate of \$375 is reasonable in this matter.